

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY,	:	JURY TRIAL DEMANDED
Plaintiff	:	
	:	
VS.	:	
	:	
COUNTY OF ERIE, ERIE COUNTY	:	
OFFICE OF CHILDREN AND YOUTH,	:	
a/k/a ERIE COUNTY CHILD WELFARE	:	
SERVICE, RICHARD SCHENKER,	:	
individually and in his capacity as County	:	
Executive of Erie County, Pennsylvania, :		
PETER CALLAN, individually and in his	:	
capacity as Erie County Director of Personnel,	:	
DEBRA LIEBEL, individually and in her	:	
capacity as Executive Director, Erie County	:	
Office of Children and Youth, a/k/a Erie	:	
County Child Welfare Service and JOHN A.	:	CIVIL ACTION NO.
ONORATO, ESQUIRE, individually and in	:	
his capacity as Erie County Solicitor	:	
Defendants	:	

**PROPOSED ORDER ON PLAINTIFF'S MOTION TO COMPEL DISCOVERY
AND FOR SANCTIONS**

AND NOW, to-wit this ____ day of January, 2006, upon consideration of Plaintiff's Motion to Compel Responses to Interrogatories and Request for Production of Documents, the Court being fully advised in the premises, hereby ORDERS that said Motion shall be, and is hereby GRANTED.

Defendant, County of Erie, shall, within twenty (20) days of the date of this Order, provide full, complete and verified responses to Plaintiff's Interrogatories and Requests for Production of Documents.

In light of the Defendant County of Erie's bad faith in this matter, the Court imposes sanctions as follows:

By the Court:

Sean J. McLaughlin, U.S.D.J.